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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA
ex rel. PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

v.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company, and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC.

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**JOINT STIPULATION AND ORDER
TO EXTEND DEADLINE FOR
THORNTON TO FILE OPPOSITION
TO AMC/RICHARDSON'S MOTION
TO DISMISS AMENDED
COMPLAINT AND STIPULATION
AND ORDER TO EXTEND
DEADLINE FOR
AMC/RICHARDSON TO FILE
REPLY TO THORNTON'S
OPPOSITION**

(First Request)

Plaintiff Peggy Thornton ("Thornton") and Defendants Apartment Management Consultants, LLC ("AMC") and Rene Richardson ("Richardson") (collectively, the "Parties"), by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend

1 Thornton's deadline to file an Opposition to AMC/Richardson's Motion to Dismiss Amended
2 Complaint from February 16, 2024, to March 1, 2024.

3 Further, the Parties, by and through their undersigned counsel, for good cause shown,
4 hereby stipulate and agree to extend AMC/Richardson's deadline to file a Reply to Thornton's
5 Opposition from March 8, 2024, to March 29, 2024. The Parties have stipulated to the above
6 deadlines for the following reasons:

7 1. Thornton's deadline to file an Opposition to AMC/Richardson's Motion to
8 Dismiss Amended Complaint is currently February 16, 2024.

9 2. Due to a family emergency recently experienced by Elizabeth S. Carmona, Esq.,
10 Thornton is requesting a two-week extension until March 1, 2024.

11 3. Counsel for AMC/Richardson has agreed to the requested extension.

12 4. Counsel for AMC/Richardson has also requested an extension to file its Reply to
13 Thornton's Opposition. Thornton agreed to an extension up to and including March 29, 2024.

14 5. If Thornton's two-week extension is granted until March 1, 2024,
15 AMC/Richardson's Reply would be due on March 8, 2024.

16 6. Due to an upcoming Ninth Circuit oral argument and planned travel the following
17 week, AMC/Richardson is requesting an extension until March 29, 2024.

18 7. These extension requests are sought in good faith and are not made for the purpose
19 of delay.

20 8. Therefore, the Parties hereby stipulate that Thornton's deadline to file an
21 Opposition to AMC/Richardson's Motion to Dismiss Amended Complaint be extended from
22 February 16, 2024, to March 1, 2024.

23 9. Additionally, the Parties hereby stipulate that AMC/Richardson's deadline to file
24 a Reply to Thornton's Opposition be extended from March 8, 2024, to March 29, 2024.

Dated: February 15, 2024

Dated: February 15, 2024

NEVADA LEGAL SERVICES, INC.

SNELL & WILMER L.L.P.

By: /s/ Kristopher S. Pre

By: /s/ Kelly H. Dove

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ORDER

IT IS SO ORDERED.

DATED: this 20th day of February, 2024.



UNITED STATES DISTRICT COURT